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Letter of Invoicing Appeal

Green Dot Tennessee Consortium (BEN 17008913)

Regarding BEAR invoice **2815980**

For 2016 Form 471: **161048386, FRN 1699110334**

Reason for the Denial: Invoice Delivered after last date to invoice.

Green Dot Public Schools (BEN 16021229), on behalf of Green Dot Tennessee Consortium (BEN 17008913), wishes to appeal the denial of the BEAR invoice 2815980 for invoice delivered after last date to invoice for the Category 2 FRN 1699110334 (Vector). Green Dot contends that USAC improperly required a new filing of the Form 498 for Green Dot Tennessee Consortium which was approved after the last date to invoice, and the invoice was filed on the same day as the Form 498 approval.

Green Dot Public Schools administers schools in 3 states—California, Tennessee, and Washington State. Green Dot Tennessee Consortium, (like it's counterpart in Washington State, Green Dot Washington Consortium) is an administrative entity created only for E-rate filing purposes to allow Green Dot Public Schools based in Los Angeles, CA to file for schools in Tennessee. Green Dot Public Schools has a Form 498 on file and has had it on file since USAC made the switch to BEAR payments direct to Billed Entity. USAC erred in requiring the purely administrative entity Green Dot Tennessee Consortium to file a new Form 498 when the payment would have gone to the Green Dot District office of Green Dot Public Schools. Had the Green Dot Public Schools Form 498 been allowed to be used, Green Dot could have filed the invoice in a timely manner. However, the new Form 498 was approved the day after the invoicing deadline, thus rendering the Tennessee Consortium BEN unable to submit the invoice in a timely manner.

The FCC regards all three entities (Green Dot District, Green Dot Tennessee Consortium and Green Dot WA Consortium) as the same entity (FCC Registration number # 0016789414). When the Consortium entities were set up with FCC registration numbers, Green Dot requested the same FCC registration number for each, explained the situation to the FCC that they were created only to properly file for E-rate in EPC, and received the same FCC registration number.



Since the FCC regards them as the same entity, USAC must also regard them as the same entity. Therefore, the existing Form 498 should have been used for all three entities.

Green Dot requests that the invoice #**2815980** be approved as timely filed using the original Form 498 on file, or in the alternate, to grant an invoice extension of 120 days from the date of the appeal approval to allow the District to re-submit the BEAR invoice.

Sincerely,

Paul Stankus

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